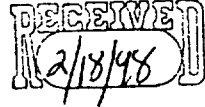


GNC LiveWell

February 13, 1998



Ms. Linda S. Kahl, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W. (HFS-450)
Washington, DC 20204

Dear Dr. Kahl:

Pursuant to section 403(r)(6) of the Dietary Supplement Health and Education Act of 1994 ("DSHEA"), General Nutrition Corporation, located at 300 Sixth Avenue, Pittsburgh, Pennsylvania 15222 ("GNC"), hereby notifies the Food and Drug Administration that it is marketing dietary supplements that bear a nutritional support statement on their labels. Enclosed please find a listing of the products and their statements of nutritional support.

As required, the product labels contain the disclaimer that this statement has not been evaluated by the Food and Drug Administration and that the product is not intended to diagnose, treat, cure, or prevent any disease. Two (2) copies of this notification are enclosed for your convenience.

On behalf of GNC, I hereby certify that the information contained in this notice is complete and accurate and that GNC has substantiation that the statements are truthful and not misleading.

Very truly yours,

A handwritten signature in black ink, appearing to read "John P. Troup".

John P. Troup
Vice President
Scientific Affairs

JPT:mo
Enclosures

97S - 0162

LET 1413

FDA NOTIFICATION TRACKING FORM FOR STRUCTURE FUNCTION STATEMENT		
Updated: 2/25/1998		
DESCRIPTION	DATE FILED	STRUCTURE FUNCTION STATEMENT
ACETYL-L-CARNITINE		
Challenge Acetyl-BCAA	1/29/98	Acetyl-L-Carnitine facilitates the metabolism of long chain fatty acids.
NNW Acetyl-L-Carnitine		"
ALPHA-LIPOIC ACID		
GNC Alpha Lipoic Acid	1/29/98	A dietary ingredient which supports antioxidant regeneration.
B-VITAMINS		
GNC Mega Men	1/29/98	B-vitamins which are essential for carbohydrate metabolism and energy production.
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC B-Complex with C Plus Herbs	1/29/98	"
NNW Vitamin B-100 with Vitamin C	1/29/98	"
NNW Vitamin B-50 Complex Form	1/29/98	"
BETA-CAROTENE		
GNC beta-Carotene	1/29/98	beta-Carotene is a precursor to Vitamin A which is essential for normal vision.
GNC Mega Men	1/29/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
Informed Nutrition Ocular Formula	1/29/98	"
BIOTIN		
GNC Mega Men	1/29/98	Biotin which functions as a coenzyme in metabolism.
CALCIUM		
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	Calcium and magnesium are essential for building teeth and bones.
GNC Women's Cal-Plus	1/29/98	Calcium is essential for building teeth and bones.
NNW Calcium Citrate Malate Formula	1/29/98	"
NNW Calcium & Magnesium w/ Zinc	1/29/98	Calcium and magnesium are essential for building bones and teeth.
NNW Cal-Mag Complex w/ Vitamin C	1/29/98	"

CHROMIUM		
GNC G.T.F. Chromium	1/29/98	Chromium is involved in normal glucose utilization.
PP Pro Chrome	1/29/98	"
Optibolic Optimax	1/29/98	Chromium Picolinate is involved in normal glucose utilization.

COPPER		
GNC Mega Men	1/29/98	Copper which is required for proper nerve cell structure.
NNW Zinc Picolinate w/ Copper	1/29/98	"

CO Q-10		
Challenge CO Q-10	1/29/98	CO Q-10 is involved in the process that produces cellular energy.
NNW Antioxidant Coenzyme Q-10	1/29/98	"

CRANBERRY		
NNW Cranberry	1/29/98	Whole dried cranberry fruit provides dietary support for normal urinary tract function.

FOLIC ACID		
NNW Folic Acid B-Complex Factor	1/29/98	Adequate folic acid in healthful diets may reduce a women's risk of having a child with a brain or spinal cord defect.
GNC HoC Program	1/29/98	Folic Acid plays a role in the maintenance of normal homocysteine levels.

FOS		
Informed Nutrition Colon Care	1/29/98	FOS helps acidophilus flourish in the intestines.

GARLIC		
NNW Vitamin E with Odorless Garlic	1/29/98	Garlic provides support for normal healthy cardiovascular function.
NNW Odorless Garlic	1/29/98	Garlic provides dietary support for normal, healthy cardiovascular function.

GLUCOSAMINE SULFATE		
Informed Nutrition Glucosamine Formula	1/29/98	Glucosamine Sulfate is a natural compound found in connective tissue.

GRAPE SEED		
NNW Grape Seed	1/29/98	Proanthocyanidins found in Grape Seed provide antioxidant support.
NNW Vitamin C w/ Bioflavonoids	1/29/98	Grape seed and green tea extracts provide antioxidant support.

17207

GUARANA		
Nature's Fingerprint Guarana Seed Extract	1/29/98	Guarana contains caffeine which has invigorating properties.

INOSITOL		
GNC Inositol	1/29/98	Inositol is important for signal transduction between cells, including nerve impulses.

IRON		
NNW Time Released Iron	1/29/98	Iron is essential to building blood, transporting oxygen and is involved in energy utilization.
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	Iron is essential to building blood and transporting oxygen.

L-ARGININE		
GNC Amino Acid L-Arginine	1/29/98	L-Arginine is involved in creatine formation. L-Arginine is one of the essential amino acids which are important for balanced nutrition.

L-CARNITINE		
GNC L-Carnitine	1/29/98	L-Carnitine facilitates the metabolism of long chain fatty acids.
PP Liquid L-Carnitine	1/29/98	"
Optibolic Optimax	1/29/98	"

L-GLUTAMINE		
Challenge Acetyl-BCAA	1/29/98	L-Glutamine, the preferential amino acid, for use in skeletal muscle.

L-LYSINE		
GNC Amino Acid L-Lysine	1/29/98	L-Lysine is one of the essential amino acids which are important for balanced nutrition.

MILK THISTLE		
NNW Milk Thistle	1/29/98	Milk Thistle supports healthy liver function.
Optibolic Optimax	1/29/98	"

1208

MAGNESIUM		
GNC Potassium Aspartate Magnesium Asp.	1/29/98	Magnesium is involved in nerve, skeletal muscle, heart, and cell function.

NIACINAMIDE

GNC No Flush Niacinamide	1/29/98	Niacinamide functions as a coenzyme in glucose oxidation.
--------------------------	---------	---

POTASSIUM

GNC Potassium Asp. Magnesium Aspartate	1/29/98	Potassium is involved in the regulation of cellular water balance.
GNC Vitamin B-6	1/29/98	"

PROFILE

Profile	1/29/98	Additionally Profile stimulates the protein synthesis effects of Insulin.
		Profile increases post-exercise blood flow which helps to: 1) restore post-exercise tissue glycogen. 2)remove Lactic Acid and metabolic waste.

SAW PALMETTO

GNC Mega Men	1/29/98	Saw Palmetto to support normal prostate function.
--------------	---------	---

SELENIUM

NNW Vitamin E Plus Selenium	1/29/98	Selenium supports the antioxidant activity of Vitamin E, which protects against free radicals.
-----------------------------	---------	--

TRIMETHYLGLYCINE (TMG)

GNC HoC Program	1/29/98	TMG is a methyl donor which helps convert homocysteine to the non-toxic amino acid Methionine.
-----------------	---------	--

VITAMIN A

GNC Cod Liver Oil	1/29/98	Vitamin A is essential for normal vision.
GNC Dry Super A & D	1/29/98	"
NNW Vitamin A & D	1/29/98	"

VITAMIN B-1

GNC B-1	1/29/98	Vitamin B-1 is essential for proper nerve and muscle function.
---------	---------	--

VITAMIN B-6

GNC Vitamin B-6	1/29/98	Vitamin B-6 is essential for nervous system function.
GNC HoC Program	1/29/98	Vitamin B-6 plays a role in the maintenance of normal homocysteine levels.

VITAMIN B-12		
GNC HoC Program	1/29/98	Vitamin B-12 may play a role in the maintenance of normal homocysteine levels.

VITAMIN C		
GNC B-Complex with C Plus Herbs	1/29/98	Vitamin C is essential for healthy bones, teeth, blood vessels, and collagen.
GNC Mega Men	1/29/98	"
GNC HoC Program	1/29/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC Women's Cal Plus	1/29/98	"
NNW Cal-Mag Complex w/ Vitamin C	1/29/98	"
NNW Chewable Vitamin C Protector Antioxidant	1/29/98	"
NNW Crystals Vitamin C w/ Rose Hips	1/29/98	Vitamin C helps protect against free radical damage.
NNW Vitamin C w/ Bioflavonoids	1/29/98	"

VITAMIN D		
GNC Cod Liver Oil	1/29/98	Vitamin D is necessary for healthy teeth and bones.
GNC Dry Super A & D	1/29/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC Triple Cod Liver Oil	1/29/98	"
GNC Women's Cal Plus	1/29/98	"
GNC Vitamin D	1/29/98	Helps support calcium absorption, important for healthy bones.
NNW Calcium Citrate Malate Formula	1/29/98	Vitamin D is necessary for healthy teeth and bones.
NNW Vitamin A&D	1/29/98	"

VITAMIN E		
GNC Activin with Vitamin E	1/29/98	Vitamin E is an antioxidant and helps maintain the proper function of the cardiovascular system.
GNC Mega Men	1/29/98	Vitamin E helps maintain the proper function of the cardiovascular system.
GNC HoC Program	1/29/98	"
GNC Teen's Multiple Vitamins Plus Minerals	1/29/98	"
GNC Women's Cal-Plus	1/29/98	"
NNW Vitamin E d-alpha Tocopheryl	1/29/98	"
NNW Vitamin E w/ odorless garlic	1/29/98	"
NNW Vitamin E plus Selenium	1/29/98	"

VITAMIN K		
GNC Mega Men	1/29/98	Vitamin K which is necessary for blood clotting.

YERBA MATE		
Optibolic Optimax	1/29/98	Yerba Mate and Green Tea provide caffeine, which have invigorating qualities.

ZINC		
GNC Chelated Zinc	1/29/98	Zinc is important for wound healing and cellular repair. Zinc is also required for proper growth and normal reproductive function.
GNC Ultra Zinc Lozenge	1/29/98	Zinc and Echinacea help support natural resistance.
NNW Calcium & Magnesium w/ Zinc	1/29/98	Zinc is important for cellular repair.
NNW Chelated Zinc	1/29/98	Zinc is important for wound healing and cellular repair.
NNW Zinc Complex Lozenge	1/29/98	"
NNW Zinc Picolinate w/ Copper	1/29/98	"